

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO
RICO, *et al.*

Debtors.¹

PROMESA
Title III

Case No. 17 BK 3283-LTS

(Jointly Administered)

**MOTION SUBMITTING SUPPLEMENTAL VERIFIED STATEMENT OF A&S LEGAL
STUDIO, PSC, LOCAL CONFLICTS COUNSEL TO THE FINANCIAL OVERSIGHT
AND MANAGEMENT BOARD, IN COMPLIANCE WITH REQUIREMENTS UNDER
THE PUERTO RICO RECOVERY ACCURACY IN DISCLOSURES ACT,
PUB. L. NO. 117-82**

In accordance with the Puerto Rico Recovery Accuracy in Disclosures Act, Pub. L. No. 117-82, 48 U.S.C. § 2178(c) (“PRRADA”), and the Court’s related Order Approving List of Material Interested Parties Pursuant to the Puerto Rico Recovery Accuracy in Disclosure Act [Docket No. 20467] (the “Order”), A&S Legal Studio, PSC, as local conflicts counsel to the Financial Oversight and Management Board of Puerto Rico, hereby submits this Supplemental Verified Statement pursuant to Rule 2014(a) of the Federal Rules of Bankruptcy Procedure.

¹ The Debtors in the jointly-administered Title III cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (iv) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Dated: August 22, 2022
In San Juan, Puerto Rico.

/s/ Luis F. del Valle

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representative of the Commonwealth of Puerto
Rico, Puerto Rico Highways and
Transportation Authority, Employees
Retirement System of the Government of the
Commonwealth of Puerto Rico, Puerto Rico
Electric Power Authority, and Puerto Rico
Public Buildings Authority*

CERTIFICATE OF SERVICE

I hereby certify that, on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notifications of such filing to all CM/ECF participants in this case.

/S/ Luis F. del Valle

Luis F. del Valle-Emmanuelli

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THE FINANCIAL OVERSIGHT AND
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Debtors.¹

PROMESA
Title III

Case No. 17 BK 3283-LTS

(Jointly Administered)

**SUPPLEMENTAL VERIFIED STATEMENT OF A&S LEGAL STUDIO, PSC, LOCAL
CONFLICTS COUNSEL TO THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD, PURSUANT TO 48 U.S.C. § 2178 AND BANKRUPTCY RULE 2014(a)**

I, Enrique R. Adames-Soto, state the following under penalty of perjury:

1. I am Enrique R. Adames-Soto, president of the law firm A&S Legal Studio, PSC (“A&S” or the “Firm”), located at 436 Hostos Avenue, San Juan, Puerto Rico. A&S is a small to mid-sized full-service law firm experienced in civil litigation and trial work, with nine (9) attorneys providing legal services to both private and governmental clients in San Juan, Puerto Rico. I am a member in good standing of the bar of the Commonwealth of Puerto Rico.

¹ The Debtors in the jointly-administered Title III cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (iv) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

2. As set forth in the current Independent Contractor Services Agreement dated July 1, 2022 (the “Services Agreement”), A&S was retained by the Financial Oversight and Management Board of Puerto Rico (“Oversight Board”), as an independent contractor rendering services per Project Assignments.

3. A&S was selected to provide services to the Oversight Board as local conflicts counsel for the Board in which the Board’s local counsel was unable to assist due to a potential conflict of interest. A&S’s compensation is set at a fixed fee of \$225.00 per hour, plus valid reimbursed expenses, unless changed in writing and signed by the Executive Director of the Board

4. In accordance with the Puerto Rico Recovery Accuracy in Disclosures Act, Pub. L. No. 117-82, 48 U.S.C. § 2178(c) (“PRRADA”), and the Court’s related Order Approving List of Material Interested Parties Pursuant to the Puerto Rico Recovery Accuracy in Disclosure Act [ECF 20467] (the “Order”), A&S, as local conflicts counsel to the Oversight Board, hereby submits this Supplemental Verified Statement pursuant to Rule 2014(a) of the Federal Rules of Bankruptcy Procedure.

5. The facts set forth in this supplemental declaration are based upon my personal knowledge, discussions with other A&S attorneys, and the Firm’s client/matter records that were reviewed by me or other A&S attorneys acting under my supervision and direction. To the extent any information disclosed in this Supplemental Verified Statement requires amendment or modification upon further review, or as additional information becomes available, another Supplemental Verified Statement would be submitted to the Court reflecting such amended or modified information.

6. In particular, this Supplemental Verified Statement is intended to clarify whether the matters on which A&S and/or A&S attorneys have represented the MIPs listed in paragraph 7(a) of A&S’s original Verified Statement [ECF 21515] relate to any of the Title III Debtors of the Oversight Board.

7. For the sake of convenience, A&S fully reincorporates herein the MIPs referenced in paragraph 7(a) of A&S's original Verified Statement [ECF 21515], that attorneys working for A&S currently represent in matters wholly unrelated to the PROMESA cases:

1. Banco Popular de Puerto Rico ("BPPR").
2. Autoridad para el Financiamiento de la Vivienda de Puerto Rico ("AFVPR").
3. Puerto Rico Aqueduct and Sewer Authority ("AAA").
4. Autonomous Municipality of San Juan ("AMSJ").

8. As part of its regular engagement by these MIPs, A&S always has expressly disclosed and made them aware of its relationship with the Board, PROMESA and Title III proceedings, which bars A&S from representing them in any matter related thereto.

9. To the best of my knowledge, information and belief formed after reasonable inquiry, the following supplements and clarifies the matters on which A&S represents the above-mentioned MIPs.

10. BPPR: A&S represents this bank in general civil cases filed against BPPR which are totally unrelated to PROMESA and/or any entity under Title III, none of which represent a conflict with the Board and/or the MIPs in matters related to these Title III cases.

11. AFVPR: A&S represents the AFVPR in foreclosures related to family loans and general civil cases filed against AFVPR which are totally unrelated to PROMESA and/or any entity under Title III, none of which represent a conflict with the Board and/or the MIPs in matters related to these Title III cases.

12. AAA: A&S represents the AAA on eminent domain actions, on judicial reviews of the adjudication of public bids and proposals, and also provides legal advice to the AAA on construction projects, all of which are totally unrelated to PROMESA and/or any entity under Title III, and none of which represent a conflict with the Board and/or the MIPs in matters related to these Title III cases.

13. AMSJ: the bulk of A&S's representation of the AMSJ consists of collection of

money and breach of contract actions filed against the municipality, all of which are totally unrelated to PROMESA and/or any entity under Title III, and none of which represent a conflict with the Board and/or the MIPs in matters related to these Title III cases.

14. To the best of my knowledge, information and belief formed after reasonable inquiry, I reiterate that A&S does not represent and will not represent any entity, other than the Board in matters related to these Title III cases. Furthermore, to the best of my knowledge, I believe that A&S (i) does not represent or hold an adverse interest in connection with the PROMESA cases and (ii) is a “disinterested person,” as that term is defined in section 101(14) of the Bankruptcy Code, relative to any entity or person on the Amended MIP List, as that term is defined in section 101(14) of the Bankruptcy Code (made applicable by PROMESA section 301(a)) in that A&S:

- (a) is not a creditor, equity security holder, or insider of the Debtors;
- (b) is not and was not, within 2 years before the date of the filing of the petition, a director, officer, or employee of the Debtors; and
- (c) does not have an interest materially adverse to the interest of the estate or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in, the Debtors, or for any other reason.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Dated: August 22, 2022
In San Juan, Puerto Rico.

/S/ Enrique R. Adames
Enrique R. Adames-Soto
President
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